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(Red)
✓456311
MAR 15 1985

Mr. D. S. Frazer
Plant Manager
Monsanto Polymer Products Company
Nitro, WV 25143

Dear Mr. Frazer:

Enclosed are the formal comments by EPA, concerning the draft Feasibility Study at the Nitro Dump Site. These comments constitute the formal approval/disapproval as contemplated by Subsection C of "WORK TO BE PERFORMED" in the draft Administrative Order on Consent.

These comments have been discussed with your staff and are mostly of an editorial/clarification nature. There is no need to submit a revised draft Feasibility Study. EPA does feel, however, that Monsanto should strongly consider capping Site 11, given the low incremental cost of this remedial measure.

Should you have any questions regarding these comments, please feel free to contact me.

Sincerely,

Walter F. Lee
Environmental Scientist

Enclosure

W.Lee;R.Paolone 7-3173 3-15-85		CONCURRENCES					
SYMBOL	3HW14	3HW14					
SURNAME	Lee	Retallick					
DATE	3/15	3/15/85					

EPA Form 1320-1 (12-70)

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GPO : 1983 O - 403-201

Comments on "Feasibility Study - Nitro Dump Site"

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Page 2, 1.1:

- First paragraph - please add the actual elevation of the site in msl.
- Second paragraph - delete the phrase "geologic and topographic".
- Third paragraph - approximately how much fill was used on the four acres covered by I-64.
- Fourth paragraph - how thick was the cap at the time of closure.

Page 3, 1.2:

- First paragraph - the statement, "The degree of contamination would be much higher if...", is not necessarily true.

Page 4, 1.2:

- Second paragraph - should read "of human exposure or to the environment".

Page 4, 2.2:

- Second sentence - What does this mean? It seems internally inconsistent.

Page 5, 3.1:

- Second sentence - delete "if concentrations were very high".

Page 5, 3.2:

- Sentence 3 - How much topsoil would be added during revegetation?

Page 6, 4.2:

- Sentence 2 - These cost estimates are inconsistent with those given in Section 2.3.

Page 6, 5:

- See comment on Section 3.2.

EPA recommends that, given the minimal cost involved, Monsanto cap Site 11. We would be willing to review additional information provided by Monsanto, supporting a "no cap" alternative for Site 11.